

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANDREW ORLANDER, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

STAPLES, INC., a Delaware Corporation,

Defendant.

Case No. 13-cv-0703-NRB

CLASS ACTION

**PLAINTIFF'S NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE that, upon the Declaration of Meagan Farmer in Support of Preliminary Approval of Settlement, dated August 11, 2017, with exhibits annexed thereto, and the accompanying memorandum of law and the Settlement Agreement with exhibits, and all prior pleadings and proceedings had herein, Plaintiff Andrew Orlander, by and through his attorneys, hereby move the Court, before the Honorable Naomi Reice Buchwald, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for the entry of the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, agreed upon by the parties: (1) granting preliminary approval of the proposed settlement; (2) approving the form and manner of giving notice of the proposed settlement to the Class; (3) for settlement purposes only, conditionally certifying the Class, appointing Plaintiff as Class Representative and Plaintiff's Counsel as Class Counsel; and (4) setting a hearing date for final approval of the settlement, and a schedule for various deadlines relevant thereto.

Dated: August 11, 2017

Respectfully submitted,

GARDY & NOTIS, LLP

By: /s/ Meagan Farmer

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